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**BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

In the Matter of
UNITED STATES NAVY,
Facility ID# 146536

Case No. 4518-10
**DECLARATION OF CRAIG
HAVERSTICK**
District Rules 203(b) and 3002(c)

Hearing Date: October 31, 2024
Time: 9:30 a.m.
Place: 21865 Copley Drive
Diamond Bar, CA 91765-0940

This declaration is submitted pursuant to South Coast AQMD Hearing Board Rule 4.

I, Craig Haverstick, state:

1. I am the Environmental Compliance Specialist in charge of compliance for the relevant equipment subject to variance petition 4518-10. If called as a witness, I will testify to the following based on personal knowledge.
2. Petitioner operates a naval installation on San Clemente Island off the coast of California (the "Facility"). The Petitioner has an auxiliary landing field there, and conducts uniquely vital military training and testing. The facility is integral to the vast complex of land and sea ranges in the southwestern United States and the ocean off the coast of California.

1 3. The Island is about 22 miles long and 4 miles wide. It has a very rugged landscape
2 rising up to almost 2000 feet above sea level at its highest point, and is deeply cut by canyons. It
3 is about 70 miles off the coast, and about 20 miles from Santa Catalina Island.

4 4. The equipment subject to this petition is two Internal Combustion Engines: Device
5 ID Nos. 021 & 0200, located at the Facility, (the “Equipment”). The equipment powers backup
6 generators, which run vital communications equipment in the event of failure of the power grid.
7 It is subject to Title V Facility PTO No. 800263.

8 5. Petitioner is in violation of Rules 203(b) and 3002(c)(1) {from Section D,
9 Condition No. C1 .1 of Title V Facility PTO No. 800263} of the South Coast Air Quality
10 Management District Rules and Regulations, because a wild fire caused catastrophic damage to
11 the electrical grid. Site power will take at least a year to restore.

12 6. Equipment has exceeded and will exceed the 200 hour per year operating limit
13 imposed by its permit under relevant rules. Petitioner was granted an ex parte emergency
14 variance, dated August 2, 2024 from the relevant annual hour limits. The equipment exceeded its
15 hour limit for 2024 on August 3, 2024. The equipment is not currently expected to exceed its
16 hour limit in 2025 because newer lower emission tier 4 portable engines have been brought in as
17 primary and backup engines for the duration of the power restoration period.

18 7. An Interim Variance was granted on consent for a 90 day period on August 29,
19 2024. It will expire on October 31, 2024.

20 8. Device D21, at Mount Thirst, operated until September 29, 2024. It operated 475
21 hours in 2024. Power has been provided in place of D21 since August 16, 2024 by a rented
22 CARB registered tier 4 portable engine (PERP 203341), backed up by another rented registered
23 tier 4 PERP. D21 has been disabled, so it will almost certainly not run until 2025, during which it
24 is very unlikely to run more than 200 hours given the presence of PERP primary and backup
25 engines.

26 9. The primary power for Device D200, at Vista, has been provided by another
27 registered rental tier 4 portable engine (PERP 193287) since August 16, 2024. D200 is still
28 connected as a backup to the PERP. It has run 343 hours in 2024. It is not likely to run further in

1 2024 because it runs at a lower load than the PERP at D21, but it is not disabled and it could run.
2 Therefore, a Variance is still requested through December 30th, but will become unnecessary in
3 2025 as the 200 hour limit will reset.

4 10. In addition to the foregoing, the Navy has a tier 3 PERP 163377 in storage at
5 present. This can be used in place of either D21 or D200 if needed and as needed. If D200's
6 current PERP fails in 2025, the tier 3 PERP will be able to replace it well before it reaches its 200
7 hour limit.

8 11. The violation is caused by a fire that consumed 13,000 acres and nine miles of
9 power lines, which furnished grid power. The fire also damaged 161 power poles and a
10 transformer. This was beyond the Petitioner's control. The Navy is in the process of hiring
11 qualified contractors via a legally mandatory fair and open contracting process to repair/replace
12 the affected equipment. This process may take several months.

13 12. In addition, the magnitude of the damage, the island's remote location, and its
14 rugged landscape further complicates repairs, probably drawing the process out to a year or more.
15 The Navy intends to submit permit applications for the tier 4 PERP engines prior to April 1, 2025
16 so that they will be legally operable as stationary units, should they be needed past the point
17 where they are deemed stationary.

18 13. The assets supported by the Equipment consist of over 400 pieces of
19 communication equipment that include radar, microwave transceivers, and tactical data links in
20 the Mount Thirst and Vista areas of the Facility. These are high points on the Island. Mount
21 Thirst is 1965 feet above sea level. Vista is somewhat lower. The equipment also supports
22 functions for the US Air Force, Coast Guard Rescue 21, Sheriff's Department, FAA, and
23 academic research labs. Rescue 21 is the Coast Guard's advanced command, control and
24 direction-finding communications system, which was created to better locate mariners in distress
25 and save lives and property at sea.

26 14. The foregoing assets are critical to national defense in that they support training of
27 personnel and testing of equipment, and they are critical to civilian functions in that they support
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1 air traffic coordination and search and rescue functions. Shutting the equipment down would
2 eliminate lawful activities which constitute vital government functions.

3 15. Shutting down the engines would cause significant harm to Petitioner and to vital
4 governmental functions, and would outweigh the benefit to air quality if the emissions associated
5 with the variance request were eliminated as a result of denying the variance. Further emission
6 from the units under variance are not likely. Any emission shall be calculated, recorded, and
7 reported with fees paid consistent with Rule 303.

8 16. Petitioner has calculated the actual excess emissions for the purpose of associated
9 fees pursuant to District Rule 3 based on hours of usage at a 100 percent load. On October 15,
10 2024 petitioner provided AQMD emissions data for D21 & D200 runtimes for the months of
11 August and September 2024. The emissions will not cause any nuisance. They are not near
12 receptors on the Island, and they are about 70 miles from the mainland and about 20 miles from
13 Santa Catalina Island.

14 17. Curtailment or shutdown was considered during the emergency variance and part
15 of the interim variance period but the effect on vital governmental functions was too great. At
16 this time curtailment of the relevant devices has been accomplished for the most part since the
17 introduction of rented tier 4 PERPs. Therefore, the Petitioner seeks a variance until the end of the
18 year to accommodate the possibility that D200 may operate for limited time prior to January 1,
19 2025.

20 18. Petitioner has reduced emissions to the maximum extent feasible. Power is now
21 being provided by tier 4 engines and backed up in significant part with the same. These have
22 superior emission profiles compared with D21 and D200. D21 will almost certainly not run
23 during the remainder of 2024. D200 is not likely to run.

24 19. Petitioner will monitor, record, and report emissions consistent with the conditions
25 set forth in the variance.

26 20. Petitioner has complied with all of the conditions imposed by the ex parte variance
27 in this matter dated August 2, 2024. I incorporate by reference the evidence given for the ex parte
28 variance and interim variance granted in this matter.

